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**MEMO ENDORSED**

March 7, 2022

**VIA CM/ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

**Re: In re Application of Frederico da Costa Pinto, 21-MC-00663-VEC (S.D.N.Y.)**

Dear Judge Caproni:

We write as counsel to interested parties and intervenors Humberto da Costa Pinto, Jr., Cooper Brazil Country Fund I, LLC, Cooper Omnibus Global Fund, LLC, and BVF5 Limited (“Intervenors”) in connection with the above-referenced case. With the consent of all parties, we write pursuant to the Court’s Individual Practices in Civil Cases Rule 2.C to request an extension of the deadlines in the Court’s February 8, 2022 Order (the “Order”) [Dkt. 23], whereby Applicant’s responses, if any, to the motion to vacate the Court’s order approving discovery, to quash subpoenas, and to stay discovery [Dkt. 16] filed by nonparty subpoena respondents Loeb, Block & Partners LLP, Yuisa Montañez, Esq., and Stephen Rasch, Esq. (“Respondents”) and to the motions to intervene [Dkts. 20, 21] are due by no later than March 11, 2022 and Respondents’ and Intervenors’ replies, if any, are due no later than March 25, 2022. The parties request an extension of Applicants’ response deadline until Monday, April 11, 2022, and of Respondents’ and Intervenors’ reply deadline until Monday, May 2, 2022.

The parties request this extension to allow additional time for the parties to address the legal and factual issues raised in the filings, and for Applicant to confer with Intervenors about whether this matter can be resolved consensually and without burdening the Court with additional briefing.

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Additionally, to the extent that Intervenor's motions to intervene [Dkts. 20, 21] were required to be filed by February 7, 2022, all parties have agreed that such filings are timely, and request that the Court deem such filings timely.<sup>1</sup>

We thank you for your time and consideration in this regard.

Regards,

*Vincent F. Alexander*

Vincent F. Alexander of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP

cc: All Counsel of Record (via CM/ECF)

Applications GRANTED.

Any responses in opposition to the motions are due no later than **April 11, 2022** and any replies in support of the motions are due no later than **May 2, 2022**. The Court will consider the motion filed on February 8, 2022 (Dkt. 21) as timely.

Given that Respondents intend to withdraw the motion filed at docket 20, the Court hereby dismisses that motion. The Court will consider the motion at docket entries 21, 22, and 24 as well as the motion filed at docket entries 16-19.

The Clerk of Court is respectfully directed to close the open motion at docket entry 20.

SO ORDERED.



Date: March 7, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

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<sup>1</sup> Respondent's counsel had technical issues when filing the motions to intervene. Respondents intend to withdraw Dkt. 20, as it was replaced by Dkt. 22.